

# EXHIBIT A

**From:** Yotam Barkai  
**Sent:** Wednesday, July 29, 2020 3:47 AM  
**To:** azzmador@gmail.com  
**Cc:** Jessica Phillips; Yotam Barkai  
**Subject:** Sines v. Kessler: Deposition  
**Attachments:** 2020.07.22 Notice of Ray Depo.pdf; 2020-07-23 00814-000 ORDER TO DEFENDANT ROBERT AZZMADOR.PDF; Deposition of Robert Ray.msg

Mr. Ray:

Plaintiffs in *Sines v. Kessler* have noticed your deposition for today beginning at 9:30 a.m. ET. Please see the attached deposition notice that was sent to you by email on July 22, 2020. In addition, the Court ordered you to appear for this deposition in its order dated July 23, 2020, ECF No. 814, which is attached.

Plaintiffs' counsel is on the Zoom video conference with the videographer and court reporter as well as counsel for other Defendants waiting for you to join. I am attaching the relevant access information that was sent to you by email yesterday.

If you do not appear for your deposition today, Plaintiffs will notify the Court and will seek all available remedies. Plaintiffs reserve all rights.

**Yotam Barkai**

Associate

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**BOIES SCHILLER FLEXNER LLP**

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**From:** Yotam Barkai

**Sent:** Wednesday, July 22, 2020 5:22 PM

**To:** isuecrooks@comcast.net; James Kolenich <jek318@gmail.com>; David Campbell <dcampbell@dhgclaw.com>; Justin Gravatt <jgravatt@dhgclaw.com>; bryan@bjoneslegal.com; edward@rebrooklaw.com; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; richardbspencer@icloud.com; richardbspencer@gmail.com; christopher.cantwell@gmail.com; dillon\_hopper@protonmail.com; azzmador@gmail.com; matthew.w.heimbach@gmail.com; eli.f.mosley@gmail.com; Eli Mosley <deplorabletruth@gmail.com>; eli.r.kline@gmail.com

**Cc:** Jessica Phillips <jphillips@bsfllp.com>; Katie Cheng <kcheng@bsfllp.com>; Yotam Barkai <ybarkai@bsfllp.com>

**Subject:** RE: Sines v. Kessler: Notice of Deposition of Robert Ray

All,

Please find attached a revised notice of deposition for Robert "Azzmador" Ray, now scheduled for **Wednesday, July 29, 2020**, at 9:30 a.m. ET via videoconference. Thank you.

**Yotam Barkai**

Associate

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**From:** Yotam Barkai

**Sent:** Wednesday, July 22, 2020 3:36 PM

**To:** isuecrooks@comcast.net; James Kolenich <jek318@gmail.com>; David Campbell <dcampbell@dhgclaw.com>; Justin Gravatt <jgravatt@dhgclaw.com>; bryan@bjoneslegal.com; edward@rebrooklaw.com; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; richardbspencer@icloud.com; richardbspencer@gmail.com; christopher.cantwell@gmail.com; dillon\_hopper@protonmail.com; azzmador@gmail.com; matthew.w.heimbach@gmail.com; eli.f.mosley@gmail.com; Eli Mosley <deplorabletruth@gmail.com>; eli.r.kline@gmail.com

**Cc:** Jessica Phillips <JPhillips@BSFLLP.com>; Katie Cheng <kcheng@BSFLLP.com>; Yotam Barkai <YBarkai@BSFLLP.com>

**Subject:** Sines v. Kessler: Notice of Deposition of Robert Ray

All,

Please find attached a notice of deposition for Robert "Azzmador" Ray, scheduled for Monday, July 27, 2020, at 9:30 a.m. ET via videoconference. Thank you.

**Yotam Barkai**

Associate

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-  
KNIGHTS, LOYAL WHITE KNIGHTS OF THE  
KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**PLAINTIFFS’ NOTICE OF DEPOSITION  
OF DEFENDANT ROBERT “AZZMADOR” RAY**

**PLEASE TAKE NOTICE** that pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiffs, by and through their undersigned counsel, will take the deposition upon oral examination of Defendant Robert “Azzmador” Ray at 9:30 a.m. ET on Wednesday, July 29, 2020, and continuing from day to day until completed. The deposition will take place before a Notary Public or other person authorized by law to administer oaths. The deposition will take place via videoconference, as agreed upon by the parties, or at such other location, date, method, and time as may be mutually agreed upon by the parties. The deposition will be recorded by stenographic means, and may be recorded by video means and through the instant visual display of the testimony. The deposition will be taken for the purpose of discovery and all other purposes permitted by the Federal Rules of Civil Procedure.

Dated: July 22, 2020

/s/ *Jessica E. Phillips*

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cmunley@cooley.com  
sastrauss@cooley.com

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2020, I served the foregoing upon the following counsel and *pro se* Defendants, via electronic mail, as follows:

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*Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South*

Christopher Cantwell  
christopher.cantwell@gmail.com

Robert “Azzmador” Ray  
azzmador@gmail.com

Matthew Heimbach  
matthew.w.heimbach@gmail.com

/s/ Jessica E. Phillips

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*Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES et al., )  
Plaintiffs, ) Civil Action No. 3:17-cv-00072  
)  
v. ) ORDER TO DEFENDANT  
) ROBERT "AZZMADOR" RAY  
)  
JASON KESSLER et al., ) By: Joel C. Hoppe  
Defendants. ) United States Magistrate Judge

This matter is before the Court on Plaintiffs' motion to sanction pro se Defendant Robert "Azzmador" Ray for failing to appear at his properly noticed deposition on July 13, 2020, and to compel Ray to appear at a deposition rescheduled for July 29, 2020. ECF Nos. 803, 813. Ray has not responded to Plaintiffs' motion. *See* ECF No. 101. Plaintiffs' requests to be reimbursed for their reasonable fees and expenses caused by Ray's failure to attend the July 13 deposition, and for a court order compelling Ray's attendance at the July 29 deposition are hereby **GRANTED**. Fed. R. Civ. P. 37(d). The motion, ECF No. 803, is denied without prejudice in all other respects.

Defendant Robert "Azzmador" Ray is hereby **ORDERED** to appear by videoconference for a deposition upon oral examination by Plaintiffs' counsel in this matter at **9:30 a.m. ET on Wednesday, July 29, 2020**, as more fully described in the attached Notice, which is sealed. ECF No. 813. The Court expects Ray to appear and participate in good faith as required by the Federal Rules of Civil Procedure. **Defendant Robert "Azzmador" Ray is hereby warned that his failure to comply with this Order may result in a bench warrant being issued for his arrest and the United States Marshal taking him into custody and transporting him to this judicial district to appear and show cause why he should not be held in contempt of court.**

It is so ORDERED.

The Clerk shall send a copy of this Order to the parties.

ENTER: July 23, 2020

John C. Hopper

Joel C. Hoppe  
U.S. Magistrate Judge

**From:** Yotam Barkai  
**Sent:** Tuesday, July 28, 2020 9:46 AM  
**To:** : 'James Kolenich'; 'Matthew Heimbach'; isuecrooks@comcast.net; 'Bryan Jones'; Edward ReBrook, ESQ; dcampbell@dhgglaw.com; azzmador@gmail.com; christopher.cantwell@gmail.com; dillon\_hopper@protonmail.com; deplorabletruth@gmail.com; eli.f.mosley@gmail.com; richardbspencer@icloud.com; richardbspencer@gmail.com  
**Cc:** Jessica Phillips; Brittany Zhang; Yotam Barkai; Michael Bloch; Calendar Dist Group; Errol Eisner  
**Subject:** Sines v. Kessler: Deposition of Robert Ray

All,

The deposition of Robert Ray is scheduled to take place at 9:30 a.m. ET tomorrow, Wednesday, July 29, 2020.

**Video**

Video and exhibits for the deposition will be displayed over Zoom. The link to join the Zoom meeting is:

<https://tsgreporting.zoom.us/j/94481968376?pwd=QXRKS1ubmhBUW5iam0vdFZrMTNFQT09>

Meeting ID: 944 8196 8376

Passcode: 285660

**Audio**

Each participant may choose to join his/her audio by either (1) computer audio through Zoom or (2) phone, using the below dial-in information. If you choose to use your phone, please ensure that your computer audio is turned off to prevent feedback.

With the exception of the witness, we ask that you remain on mute when you are not speaking.

*Phone Dial-in Info:*

One tap mobile

+16465588656,,94481968376# US (New York)

+13017158592,,94481968376# US (Germantown)

Dial by your location

+1 646 558 8656 US (New York)

+1 301 715 8592 US (Germantown)

+1 312 626 6799 US (Chicago)

+1 346 248 7799 US (Houston)

+1 669 900 9128 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 944 8196 8376

Find your local number: <https://tsgreporting.zoom.us/u/aeJsoOjfrG>

Please contact TSG Reporting if you have any technology-related questions or concerns.

Thank you.

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